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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

OCT - 1 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
Rules For the Filing of International)
Circuit Status Reports)

CC Docket No. 93-157

REPLY COMMENTS

MCI Telecommunications Corporation ("MCI") hereby replies to the comments filed on September 1, 1993, in response to the Commission's Notice of Proposed Rulemaking ("NPRM"), 58 F.R. 42922 in the above-captioned proceeding.

I. INTRODUCTION

MCI supports the Commission's goal to streamline the filing of international circuit status reports for international common carriers. MCI also agrees with the Commission that the reports should be codified, that all facilities based international carriers should be required to file such reports and that the Commission should provide for a filing manual with a specified format for the filing of those reports on computer diskettes.

In its comments MCI recommended that the Commission require that all carriers report the capacity of each transmission system at a circuit level with a standardized bandwidth.¹ MCI asserted

¹ MCI suggested that all digital circuits be reported at standard bandwidth of 64 kilobits ("Kb/s") and that all analog circuits be reported as single circuits capable of transmission speeds up to 9.6 Kb/s for the provision of telecommunications

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that these bandwidth levels are currently used by all carriers providing international services, regardless of the carrier's size, the facilities used or the services provided. MCI also proposed that the redundant bi-annual reporting requirements, currently codified in the Commission's rules, be eliminated.²

II. MCI'S SUGGESTED MODIFICATIONS TO THE COMMISSION'S PROPOSALS WILL ADVANCE THE GOALS OF THIS PROCEEDING

American Telegraph and Telephone Company ("AT&T"), Sprint Communications Company L. P. ("Sprint") and other commenters agree with MCI that the circuit status reports, if streamlined and filed on an annual rather than a monthly basis, will provide the Commission with information needed to assess the industry trends in the use of international transmission facilities. GTE Service Corporation ("GTE") and Sprint support MCI's proposals to eliminate the redundant reporting requirement under §63.10 of the Commission's Rules. GTE also suggests that the Commission require circuits to be reported in 64 Kb/s voice-grade circuits, as MCI proposed for the reporting of digital circuits.

MCI agrees with AT&T and Sprint that the Commission's proposed filing manual be developed with input from affected carriers and,

services. MCI now clarifies that all analog circuits be reported at a 4 Kiloherz ("KHz") level, as this is a more accurate method of reporting the actual transmission speeds for analog circuitry.

² Although the Commission did not request comment on the bi-annual reports, MCI requested that if the Commission should find these reports are of value, the Commission should revise this reporting requirement and require carriers to file this report on an annual basis concurrent with the filing of the Commission's proposed circuit status report.

as Sprint suggests, the Common Carrier Bureau should seek comment on the proposed manual prior to its adoption. MCI also agrees with COMSAT that the manual should contain a very specific format, one that is convenient for all carriers to duplicate.

In sum, MCI's modifications to the Commission's proposals, all supported by commenters in the proceeding, will enhance the ability of U.S. carriers to provide the Commission with circuit status information in a uniform and standard format and ensure that Commission reported data accurately reflects use of existing international transmission facilities, a goal of this proceeding.

Respectfully submitted,

MCI TELECOMMUNICATIONS CORPORATION

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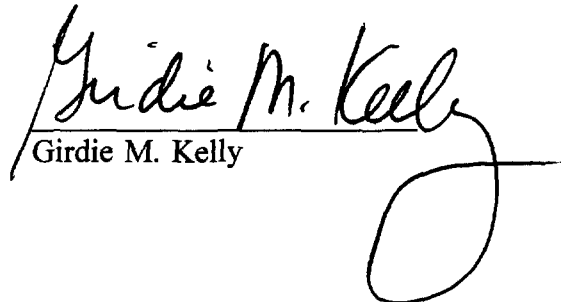
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Dated: October 1, 1993

CERTIFICATE OF SERVICE

I, Girdie M. Kelly, hereby certify that on this 1st day of October, 1993, a copy of MCI Telecommunications Corporation's REPLY COMMENTS, was mailed by U.S. first class mail, postage prepaid, unless otherwise noted, to the parties listed below.


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